

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**MEMORANDUM**

12/4/2018

**SUBJECT:** Product Chemistry Review for Registration for Everclean EPA Reg. No.: 777-RGL

**FROM:** Lynette T. Umez-Eronini

Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

Peer Reviewer:

**THRU:** Karen P. Hicks, Team Leader

Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

Registrant: Reckitt  
Benckiser LLC  
Action code: A540

Agency Due Date:  
1/23/2019

DP No.: 448735

Submission No.: 1023068

E-Sub No.: 31254

Classification: EP

Process: Integrated  
system

Pesticide type: Biocide

**TO:** Jacqueline Hardy, PM Team 34 / Stacey Grigsby  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

MRID(s):50598901, 50598902, 5059890, 50598904, 50598905, 50598906, 50598907

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
021801	77-92-9	Citric acid	2.50
		Other Ingredients	97.50
		Total	100.00

777-RGL\_D448735\_Everclean

## I. BACKGROUND

The Registrant, Reckitt Benckiser LLC, has submitted an application for pesticide registration for their product: Everclean EPA Reg. No. 777-RGL.

## II. RELEVANT DOCUMENTS

	RECEIVED	N/A
Cover letter (8/2/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-1 – Application for Pesticide - Registration (11/27/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-1 – Formulator’s Exemption Statement (7/23/2018)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-34 – Certification with Respect to Citation of Data (7/23/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (Public and Agency copy) (8/24/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-36 – Summary of the Physical/Chemical Properties (PR Notice 98-1) (11/30/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-37 – Self-Certification Statement for the Physical/Chemical Properties (PR Notice 98-1) (11/30/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input type="checkbox"/>
Proposed CSF Basic (Bathroom Cleaner) (Formula # e0111-136A), (11/30/2018) Alternate (Shower Cleaner) (Formula # e0111-140), (11/30/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (8/2/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Email from Registrant (10/8/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF	--	
Comments:		

## III. FINDINGS

### a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Active Ingredients(s)	Nominal	Upper limit	Lower limit
Citric Acid	2.50%	2.63%	2.36%
	YES	NO	N/A
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### **IV. Additional Findings**

1. CSFs for Basic (Bathroom Cleaner) (Formula # e0111-136A) and Alternate (Shower Cleaner) (Formula # e0111-140), each dated 11/30/2018 are acceptable.
2. MRID 50598901 requires upgrading. It contains attachments which could not be opened and reviewed. The registrant electronically (see email, dated 10/8/2018) sent attachments which could be downloaded. Review of the downloaded attachments support and address Group A product chemistry data. Hence, MRID 50598901 is used herein to support Group A product chemistry data.
3. Group A product chemistry data requirements applicable to end-use product have been met (see MRID 50598901 and Table A below).
4. Group B product chemistry data requirements applicable to end-use product have been met (see MRID 50598902; Table B below; and EPA Form 8570-36, dated 11/30/2018).

#### **V. Conclusion**

The Product Science Branch of Antimicrobials Division finds Basic (Bathroom Cleaner) (Formula # e0111-136A) and Alternate (Shower Cleaner) (Formula # e0111-140), each dated 11/30/2018 to be acceptable. Group A and B Product Chemistry Data requirements have been met.

#### **VI. RECOMMENDATION**

1. Upgrade MRID 50598901 by submitting a hard or electronic study that contains readable attachments.

**VI. Table A:**  
**Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50598901
830.1600	Description of materials	Acceptable	50598901
830.1620	Description of production process	Acceptable	50598901
830.1650	Description of formulation process	Acceptable	50598901
830.1670	Discussion of formation of impurities	Acceptable	50598901
830.1700	Preliminary analysis	Acceptable	50598901
830.1750	Certified limits	Acceptable	50598901
830.1800	Enforcement analytical method	Acceptable	50598901
830.1900	Submittal of samples	Acceptable	50598901

**VII. Table B: Series 830 guidelines – Group B**

OPPTS#	Name	Study Findings/Comment		Status	MRID
830.6302	Color	Not required for end use product		Not applicable	N/A
830.6303	Physical state	Liquid		Acceptable	EPA FORM 8570-36
830.6304	Odor	Not required for end use product		Not applicable	N/A
830.6313	Stability to normal & elevated temperatures, metals & metal ions	Not required		Not applicable	N/A
830.6314	Oxidation/Reduction	No change (water); Partially dissolved in monoammonium phosphate; Immiscible/no reaction with turpentine		Acceptable	EPA FORM 8570-36
830.6315	Flammability	No flash point observed within the working range of the instrument (83.8 – 199.4°F)		Acceptable	EPA FORM 8570-36
830.6316	Explodability	Contents were not under pressure and did not contain known explosives, so it was not expected to explode on impact.		Acceptable	EPA FORM 8570-36
830.6317	Storage stability	Time, week	Active Ingredient, %	Acceptable	50598907 & EPA FORM 8570-36
		0	2.54		
		2	2.53		
		Concentration of active ingredient is within EPA Standard Certified Limits.			
830.6319	Miscibility	Product is not an emulsion and is not diluted with petroleum solvent. Test not required.		Acceptable	EPA FORM 8570-36
830.6320	Corrosion characteristics	No packaging changes noted. No evidence of corrosion on the lids, liners, seams or sides of the container.		Acceptable	50598907 & EPA FORM 8570-36
830.6321	Dielectric breakdown voltage	N/A. The product was not intended to be used around electrical equipment.		Acceptable	EPA FORM 8570-36

830.7000	pH	Average of 3 replicates 2.27	Acceptable	EPA FORM 8570-36
830.7050	UV/Visible absorption	Not required for MUP or EP	Not applicable	N/A
830.7100	Viscosity	Kinematic Viscosity: 1.182 centistokes Dynamic Viscosity: 1.194 centistokes	Acceptable	EPA FORM 8570-36
830.7200	Melting point	Not required for MUP or EP	Not applicable	N/A
830.7220	Boiling point	Not required for MUP or EP	Not applicable	N/A
830.7300	Density/relative	Average of 2 replicates: 1.0098 g/ml	Acceptable	EPA FORM 8570-36
830.7370	Dissociation constants in water	Not required for MUP or EP	Not applicable	N/A
830.7520	Particle size	Not required for MUP or EP	Not applicable	N/A
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Not applicable	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP	Not applicable	N/A
830.7950	Vapor pressure	Not required for MUP or EP	Not applicable	N/A

# CONFIDENTIAL ATTACHMENT



Pages 9-14 \*Confidential Statement of Formula May be Entitled to Confidential Treatment\*

**From:** [De Carlo, Jennifer](#)  
**To:** [Eronini, Lynette](#)  
**Cc:** [Hardy, Jacqueline](#); [Grigsby, Stacey](#); [Hicks, Karen](#)  
**Subject:** RE: [EXTERNAL] 777-RGL  
**Date:** Monday, October 08, 2018 1:32:03 PM  
**Attachments:** [TS6 Spray Trigger.pdf](#)  
[D8323090 - Determination of Citric Acid.pdf](#)  
[ATT00001.txt](#)  
[HDPE 22 oz Bottle.pdf](#)  
[Test Method - 1.pdf](#)  
[Test Method - 4.pdf](#)  
[Test Method - 6.pdf](#)  
[Test Method - 8.pdf](#)  
[Test Method - 22.pdf](#)  
[Test Method - 57.pdf](#)  
[Test Method - AL001.pdf](#)  
[Test Method - AL023.pdf](#)  
[Test Method - MTM.003.pdf](#)  
[TS6 Foam Trigger.pdf](#)  
[Test Method - 101.pdf](#)  
[Cargill Citric Acid - 5 Lots.pdf](#)  
[11 Group A - FINAL.pdf](#)  
[777-XXX - CSF - Shower Cleaner - e111-140.pdf](#)  
[04 777-XXX - CSF - BRC Cleaner - e0111-136A.pdf](#)

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Hi Lynette,

I am resending my e-mail with the revised CSF's and Group A report with attachments that were not able to be opened as it appears my initial e-mail did not go through. If you could please let me know if you receive this message, that would be great.

If you have any questions or if there is anything else you require to complete your review of 777-RGL, please do not hesitate to contact me directly on my cell phone at [REDACTED] or by e-mail, [Jennifer.decarlo@rb.com](mailto:Jennifer.decarlo@rb.com).

Best regards,  
Jennifer

*\*Personal privacy information\**



#### NOTICE

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policies.

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**From:** Eronini, Lynette <Eronini.Lynette@epa.gov>

**Sent:** 26 September 2018 11:31

**To:** De Carlo, Jennifer <Jennifer.DeCarlo@rb.com>

**Cc:** Hardy, Jacqueline <Hardy.Jacqueline@epa.gov>; Grigsby, Stacey <Grigsby.Stacey@epa.gov>; Hicks, Karen <Hicks.Karen@epa.gov>

**Subject:** [EXTERNAL] 777-RGL

Jennifer DeCarlo,

I called this morning and left a voice message.

I am doing the chemistry review for this submission. Looking at the data package shows 2 different Basic CSFs; missing alternate CSF; and attachments in MRID 50598901 that cannot be opened on my end. Please resubmit updated CSFs (nominal concentration to 2 decimal places) and studies along with downloaded/opened attachments so the chemistry review can be completed in a timely manner. Please contact me.

Lynette T. Umez-Eronini

Antimicrobials Division

Office of Pesticide Program

703-347-0132



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

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**SUMMARY OF THE PHYSICAL/CHEMICAL PROPERTIES (PR Notice 98-1)**

1. <b>PRODUCT NAME:</b> Everclean		2. <b>Reg. No.</b> 777-XXX
3. <b>COMPANY NAME:</b> Reckitt Benckiser		4. <b>SUBMISSION DATE:</b> 11/30/2018
5. <b>FIRST SUBMISSION</b> [x] 6. <b>RESUBMISSION</b> [ ]	7. <b>PESTICIDE TYPE:</b> Biocide	10. <b>REGISTRATION</b> [x]
8. <b>FORMULATED MANUFACTURING-USE PRODUCT</b> [ ] or 9. <b>END-USE PRODUCT</b> [ ]		11. <b>REREGISTRATION</b> [ ]
13. <b>PRODUCT MANAGER OR CHEMICAL REVIEW MANAGER #/NAME (IF KNOWN):</b>		12. <b>REREG CASE #</b>
14. <b>GUIDELINE REFERENCE NO.(GRN)/TITLE</b>	15. <b>VALUE or QUALITATIVE DESCRIPTION/METHOD(s) USED WHERE APPLICABLE AND REFERENCES</b>	16. <b>MRID or REPORT NO.</b>
<b>Group B, Series 830-Physical and Chemical Properties (40 CFR 158.190)</b>		
-6302 Color	Lovibond Color #1	RB MS# 2018-0033
-6303 Physical State	Liquid Substance with no clumping nor phase separation present	RB MS# 2018-0033
-6304 Odor	Fragrance	RB MS# 2018-0033
-6314 Oxidation/Reduction: Chemical Incompatibility	No change (water); Partially dissolved in Monoammonium Phosphate, Immiscible/no reaction with turpentine	RB MS# 2018-0033
-6315 Flammability/Flame Extension	N/A (No flash point observed from 83.8 - 199.4 degrees Fahrenheit)	RB MS# 2018-0033
-6316 Explodability	Contents were not under pressure & did not contain known explosives, so it was not expected to explode on impact	N/A
-6317 Storage Stability	Active Analysis: Initial concentration was 2.54%, after 2 weeks at 54 Centigrade, concentration was 2.53% (-0.01% change over time) Weight Loss did not exceed 0.20% during after 2 weeks at 54 Centigrade	RB MS# 2018-0035
-6319 Miscibility	Product is not an emulsion and is not diluted with petroleum solvent. Testing was not required.	N/A
-6320 Corrosion Characteristics	No packaging changes noted. There was no evidence of corrosion on the lids, liners, seams, or sides of the container.	RB MS# 2018-0033
-6321 Dielectric Breakdown Voltage	The product was not intended to be used around electrical equipment therefore, this guideline does not apply.	N/A
-7000 pH	Average of 3 replicates: 2.27	RB MS# 2018-0033
-7100 Viscosity	Average Efflux Time: 112.77 sec... Kinematic Viscosity: 1.182 centistokes; Dynamic Viscosity: 1.194 centistokes	RB MS# 2018-0033
-7300 Density/Relative Density/Bulk Density	Average of 2 replicates: 1.0098 g/mL	RB MS# 2018-0033





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**SELF-CERTIFICATION STATEMENT FOR THE  
PHYSICAL/CHEMICAL PROPERTIES (PR NOTICE 98-1)**

Product Name: Everclean

Reg. No./File Symbol No. 777-XXX  
(if known) or Company No.

**SELF-CERTIFICATION STATEMENT:**

I certify that the reported information on the "Summary Form" represents a true and accurate record of the test results of studies generated or owned by (Company Name): Reckitt Benckiser

and that the values of the properties reported are reliable.

I further certify that such data was generated in substantial conformity with OPPTS Test Guidelines Series 830 Product Properties, applicable to my product, and in effect at the time of submission.

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of section 12(a)(2)(N) of FIFRA without opportunity for hearing, if I have not submitted to EPA within thirty (30) days of receipt of a request by the Agency, or within a specified time agreed to by the Agency, test results of studies summarized in the "Summary Form."

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of sections 12(a)(2)(N), 12(a)(2)(Q), or 12(a)(2)(R) of FIFRA without opportunity for hearing, if I fail to provide to EPA within thirty (30) days of receipt of a notification of error, or within a specified time agreed to by the Agency, information that EPA determines is required to correct the error.

Type Applicant's Name:

Jennifer De Carlo

Title:

Senior Regulatory Associate

Telephone No.

973-404-2995

Applicant's Signature:

Date:

November 30, 2018